

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

WILLIAM E. FRANKE,)	
)	
Plaintiff/Judgment Creditor,)	
)	
v.)	Case No. 4:11-CV-01860-JCH
)	Return Date: May 11, 2020
ROBERT P. GREENE,)	
)	
Defendant/Judgment Debtor.)	

INTERROGATORIES DIRECTED TO GARNISHEE

TO: GF WELLNESS S. GRAND LLC
Serve: SCW Registered Agent, Inc., Registered Agent
8809 Ladue Rd.
St. Louis, MO 63124

Note: This garnishment and execution is directed to any and all property belonging to and assets of Defendant and Judgment Debtor, ROBERT P. GREENE, whose last known address is 2180 White Lane Drive, Chesterfield, MO, 63017 Social Security Number 492-74-XXXX, including but not limited to any and all depository accounts held in the name of or for the benefit of Robert P. Greene, and any other property of whatever type belonging to Defendant and Judgment Debtor individually or jointly with any other person or entity, which is in your custody or control, and which is subject to garnishment and execution.

INSTRUCTIONS: You are to answer interrogatories UNDER OATH within ten (10) days after the return date of the writ and mail the ORIGINAL to:

Clerk, United States District Court
111 South Tenth Street, Suite 3.300
St. Louis, Missouri 63102

and a COPY to the attorney for the Judgment Creditor listed below:

Brian E. McGovern
McCarthy, Leonard & Kaemmerer, L.C.
825 Maryville Centre Dr., Suite 300
Town & Country, MO 63017

Comes now Plaintiff/Judgment Creditor William E. Franke, pursuant to Rule 69 of the Federal rules of Civil Procedure and Rule 90.13 of the Missouri Supreme Court Rules, and exhibits the following interrogatories to be answered by the Garnishee, under oath, within ten (10) days of the returnable date.

1. At the time of service of the garnishment, had you, or have you since that time had, or have you now in your possession, custody, or charge, any goods, chattels, monies, membership interests, credits or effects belonging to the Defendant and Judgment Debtor, ROBERT P. GREENE, individually or jointly with any other person or entity? If so, state what they were or are, their value, and identify each joint or co-owner, and attach copies of any documents reflecting the identity and/or ownership of any such goods, chattels, monies, credits or effects to your answer.

Answer:

2. At the time of service of the garnishment, were you, or have you since become, or are you now in any way, indebted to the Defendant and Judgment Debtor, ROBERT P. GREENE? If your answer is “yes,” state to what extent and in what manner the debt accrued, and if evidenced

by any instrument in writing, describe the same and state what has become of the same and under whose custody it is held, and attach a copy of this instrument to your answer.

Answer:

3. At the time you were summoned as Garnishee, or since that time, have you become, or are you now bound under any contracts to pay the Defendant and Judgment Debtor, directly or to any other party on account of Defendant and Judgment Debtor, any monies which are not yet due? If your answer is “yes,” state the nature of said contract, the names of the contracting parties, the amount of money to become due thereunder, when the same was or is due and payable, exactly to whom the money is due and attach a copy of said contract to your answer.

Answer:

4. Have you paid to Defendant and Judgment Debtor, ROBERT P. GREENE, or to anyone acting as his agent, or to anyone in his behalf, or to anyone on account of Defendant and Judgment Debtor, Robert P. Greene, any money, property or effects since the time the garnishment summons herein was served on you? If your answer is “yes,” state when the same was paid, the amount and nature of said payment and to whom it was paid, in what capacity the recipient received it and if paid under the terms of a contract, attach a copy of said contract.

Answer:

Respectfully Submitted,

McCARTHY, LEONARD & KAEMMERER, L.C.

By: /s/ Brian E. McGovern
Brian E. McGovern, #34677
bmcgovern@mlklaw.com
825 Maryville Centre Dr., Suite 300
Town & Country, MO 63017
(314) 392-5200 (telephone)
(314) 392-5221 (facsimile)
Attorney for Plaintiff/Judgment Creditor
William E. Franke

ATTESTATION TO BE COMPLETED BY GARNISHEE

STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

_____, being first duly sworn and upon oath, states that the foregoing answers to Interrogatories are true and correct to the best of his knowledge, information and belief.

By:_____

Subscribed and sworn to before me this ____ day of _____, 2020.

Notary Public

My commission expires:

GARNISHEE'S
CERTIFICATE OF SERVICE

A copy of the foregoing Answers of Garnishee to Interrogatories was served upon Brian E. McGovern., Attorney for Plaintiff, William E. Franke, 825 Maryville Centre Dr., Suite 300, Town & Country, MO 63017, by mailing the same this ____ day of _____, 2020.

Garnishee